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June 27, 2014

CONFIDENTIALITY REQUESTED PURSUANT TO 47 C.F.R. § 0.459

Marlene H. Dortch Secretary Federal Communications Commission 445 12th St., SW Washington, DC 20554

Re: CG Docket 03-123

Dear Ms. Dortch:

Pursuant to the Commission's decision in *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, GC Docket No. 96-55 (FCC 98-184), released Aug. 4, 1998 ("*Confidential Information Order*") and in accordance with the Freedom of Information Act ("FOIA") and the Commission's Rules related to public information and inspection of records, *e.g.* 47 C.F.R. §§ 0.457 and 0.459, AT&T Services Inc. ("AT&T"), on behalf of itself and its telephone companies, hereby submits this request for confidential treatment of information provided by AT&T to the Federal Communications Commission in response to Public Notice, DA 14-831, CG Docket No. 03-123, released June 17, 2014 ("Public Notice").

Statement pursuant to 47 C.F.R. § 0.459(b)

(1) Identification of the specific information for which confidential treatment is sought.

The Public Notice seeks the total number of interstate relay calls by type of TRS (*i.e.*, traditional TRS, speech-to-speech (STS), captioned telephone service (CTS), Internet protocol (IP) CTS, IP Relay, video relay service (VRS)). This information is confidential commercial information under Exemption 4 of the FOIA, 5 U.S.C. § 552(b)(4). Accordingly, pursuant to Commission Rule 0.459(a), AT&T requests that such information not be made routinely available for public inspection. AT&T, as a TRS provider, has an expectation that its confidential business and financial information will remain confidential. Further, Commission Rule 64.604(c)(5)(iii)(I), 47 C.F.R. §64.604(c)(5)(iii)(I), provides for such confidentiality.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.

The information is being provided in response to the Public Notice identified above, as part of AT&T's submission of complaint logs.

(4) Explanation of the degree to which the information concerns a service that is subject to competition; and

The information provided involves intrastate and interstate TRS provided by AT&T. Relay service is a competitive business with the potential for providers to bid for contracts with States for the provision service in competition with other TRS providers. The presence of such competition and the likelihood of competitive injury threatened by release of the information should compel the Commission to withhold the information from public disclosure. *CNA Financial Corp. v. Donovan,* 830 F.2d 1132, 1152 (D.C. Cir. 1987); *Frazee v. U.S. Forest Service,* 97 F.3d 367, 371 (9th Cir. 1996); *Gulf & Western Indus. v. U.S.,* 615 F.2d 527, 530 (D.C. Cir. 1979).

- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.
- (5) Explanation of how disclosure of the information could result in substantial competitive harm.

Exemption 4 requires a federal agency to withhold from public disclosure confidential or privileged commercial and financial information of a person unless there is an overriding public interest requiring disclosure, and the Commission has a longstanding policy of protecting the confidential commercial information of its regulatees under FOIA Exemption 4.

Two lines of cases have evolved for determining whether agency records fall within Exemption 4. Under *Critical Mass*, commercial information that is voluntarily submitted to the Commission must be withheld from public disclosure if such information is not customarily disclosed to the public by the submitter. For materials not subject to *Critical Mass, National Parks* establishes a two part test for determining if information qualifies for withholding under Exemption 4. The first prong asks whether disclosing the information would impair the government's ability to obtain necessary information in the future. The second prong asks whether the competitive position of the person from whom the information was obtained would be impaired or substantially harmed. If the information meets the requirements of either prong, it is exempted from disclosure under Exemption 4. Under both *Critical Mass* and *National Parks*, the information provided by AT&T falls within Exemption 4.

The quantity of TRS calls, by type, being provided in response to the Public Notice is not customarily released to the public, is maintained on a confidential basis, and is not ordinarily disclosed to parties outside the company. Disclosure would subject AT&T to competitive harm. Although AT&T is required to disclose its relay calls to the Interstate TRS administrator, Commission rule 64.604(c)(5)(iii)(I), 47 C.F.R. §64.604(c)(5)(iii)(I), requires the Administrator to keep the information confidential. Competitors could use the confidential information to assist in targeting their request for proposal responses to States to the detriment of the competitive position of AT&T, if AT&T does not follow through with current plans to exit the

² National Parks & Conservation Assoc. v. Morton, 498 F.2d 765 D.C. Cir. (1974) ("National Parks").

¹ Critical Mass Energy Project v. NRC, 975 F.2d 871, 879 (D.C. Cir. 1992).

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relay business. *See, e.g., GC Micro Corp. v. Defense Logistics Agency*, 33 F. 3d 1109 (9th Cir. 1994).

Commission precedent has clearly found competitively sensitive information to be withholdable under Exemption 4.³ Specifically, the Commission has recognized that competitive harm can result from the disclosure of confidential business information that gives competitors insight into a company's costs, pricing plans, market strategies, and customer identities. *See Pan American Satellite Corporation*, FOIA Control Nos. 85-219, 86-38, 86-41 (1986).⁴ The protective procedures established by the Commission and other governmental agencies recognize the need to keep such information confidential to the maximum extent possible. The Commission has provided the assurances that it is "sensitive to ensuring that the fulfillment of its regulatory responsibilities does not result in the unnecessary disclosure of information that might put its regulatees at a competitive disadvantage."⁵

Disclosure also will impair the Commission's ability to obtain similar information in the future. The Public Notice reminds relay providers of their obligation to file complaint logs under Commission Rule Section 64.604(c)(1). Although this Commission rule does not require providers to file the number of relay calls with the complaint logs, the Commission asks for such information, ostensibly to evaluate the number of complaints relative to the number of calls. AT&T would not voluntarily provide the information to the Commission if it does not remain confidential and is subject to a FOIA request. Thus, disclosing this information would hamper the general ability of the Commission to analyze information and conduct investigations and to rely on the cooperation of parties, which would necessarily impair the Commission's ability to obtain documents and information in investigations and enforcement proceedings. It would, in short, undermine the agency's "effective execution of its statutory responsibilities." 9 to 5 Org.

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³ See, e.g., Pacific Bell Telephone Company Petition for Pricing Flexibility for Special Access and Dedicated Transport Services, CCB/CPD No. 00-23, DA 00-2618 (2000) (supporting confidentiality for collocation data); Local Exchange Carrier's Rates, Terms and Conditions for Expanded Interconnection Through Virtual Collocation for Special Access and Switched Transport; Southwestern Bell Telephone Company, 13 FCC Rcd 13615 (1998) (keeping administrative operating expenses confidential because it would provide insight into business strategies); AT&T/McCaw Merger Applications, 9 FCC Rcd 2610 (1994) (keeping confidential accounting records showing account balance information); NAACP Legal Defense Fund on Request for Inspection of Records, 45 RR 2d 1705 (1979) (keeping confidential records that contained employee salary information); Mercury PCS II, LLC (Request for Inspection of Records) Omnipoint Corporation (Request for Confidential Treatment of Documents), FCC 00-241 (2000) (keeping confidential marketing plans and strategy information).

⁴ Further, the Commission has ruled that not only should such data be protected, but also that information must be protected through which the competitively sensitive information can be determined. *Allnet Communications Services, Inc. Freedom of Information Act Request,* FOIA Control No. 92-149, Memorandum Opinion and Order, at 3 (1993). The Commission's decision was upheld in a memorandum opinion of the U.S. Court of Appeals for the D.C. Circuit, which affirmed a U.S. District Court decision protecting the information. *Allnet Communications Services, Inc. v. FCC*, Case No. 92-5351 (memorandum opinion issued May 27, 1994, D.C. Cir.).

⁵ Confidential Information Order at \P 8.

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for Women Ofce Workers v. Board of Governors, 721 F2.s 1, 11 (lst Cir. 1983). See also Africa Fund v. Mosbacher, No. 92- 289, 1993 WL 183736 at *7 (S.D.N.Y. May 26,1993) (disclosure would impinge upon agency's receipt of substantial information that potential exporters voluntarily submit when seeking export licenses and that the agency finds invaluable in making policy and maintaining effective export controls).

- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure; and
- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

This information has been maintained on a confidential basis within AT&T and, except for the disclosure to the Interstate TRS Administrator that is required by law but subject to confidentiality by rule, is not ordinarily disclosed to parties outside the company. Company practices instruct employees not to disclose such information outside the company and restrict access to this information on a need-to-know basis.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.

The information and documents provided in response to the Inquiries must be kept confidential for an indefinite period. Confidential treatment must be afforded these materials as long as they would provide a basis for AT&T's competitors to gain insight into AT&T's business operations. AT&T cannot determine at this time any date on which the information would become "stale" for such a purpose.

Conclusion

For all the foregoing reasons AT&T requests that the Enforcement Bureau withhold from public disclosure pursuant to Section 0.459 of the Commission's Rules the proprietary commercial and financial information of AT&T. If the Commission is unable for any reason to keep this information confidential, AT&T respectfully requests that the Commission return the information to AT&T pursuant to Section 0.459(e) of the Rules.

Sincerely.

Robert Vitanza



Vonda Long-Dillard Associate Director Federal Relations AT&T Services, Inc. 1120 20th St. NW, Suite 1000 Washington, D.C. 20036 Phone 202 457-2043 Fax 202 457-3070 *E-Mail*: vonda.long@att.com

June 27, 2014

CONFIDENTIALITY REQUESTED PURSUANT TO 47 C.F.R. § 0.459

REDACTED

Via ECFS

Marlene H. Dortch Secretary Federal Communications Commission 445 12th St., SW Room TW-A325 Washington, DC 20554

Re: AT&T Submission of TRS Consumer Complaint Logs

Period June 1, 2013 through May 31, 2014

CG Docket 03-123

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission ("FCC") Rule Section 64.604(c)(1) and Public Notice DA 14-831, released on June 18, 2014, AT&T hereby submits its Annual Summary of TRS Consumer Complaint Logs alleging a violation of federal TRS mandatory minimum standards for the time period June 1, 2013 through May 31, 2014.

In addition to providing interstate traditional TRS and interstate captioned telephone service, AT&T is also the current contracted relay provider for the following:

- Arizona Captioned telephone service and traditional TRS
- California Traditional TRS
- Colorado Captioned telephone service and traditional TRS
- Florida Captioned telephone service and traditional TRS
- Michigan Captioned telephone service and traditional TRS
- Pennsylvania Traditional TRS
- Tennessee Traditional TRS
- Virginia Traditional TRS
- Washington, DC Captioned telephone service and traditional TRS

AT&T has provided to each Relay Administrator a log and summary of customer complaints alleging a violation of the TRS rules for their individual filing.

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As requested in the Public Notice, AT&T has provided in the attached chart the number of interstate calls by type of TRS that it handled during the reporting period. Pursuant to Section 0.459 of the Commission rules, AT&T requests confidential treatment of this information because it is exempt from disclosure under FOIA exemption 4.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Vonda T. Long-Dillard

Attachment

AT&T RELAY SERVICES- Long Distance Relay, IP Relay, Non-contract states 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS



June 1, 2013 through May 31, 2014

				2013						2014			
AT&T Other	NOC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE	0	0	0	0	0	0	0	0	0	0	0	0	0
TTY	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0

AT&T Relay LDRC, IP Relay, Non-contract states combined Complaint Summary by Category

				2013						2014			
Complaint Category	NOC	10f	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													0
Confidentiality													0
Verbatim													0
Typing Issues													0
In Call Replacement													0
Answer Performance													0
Gender Accommodation													0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0

AT&T RELAY SERVICES-Long Distance Relay, IP Relay, Non-contract states



2013-14 FCC Annual Consumer Summary Log

June 2013
Nothing to report.
July 2013
Nothing to report.
August 2013
Nothing to report.
September 2013
Nothing to report.
October 2013
Nothing to report.
November 2013
Nothing to report.
December 2013
Nothing to report.
January 2014
Nothing to report.
February 2014
Nothing to report.
March 2014

AT&T RELAY SERVICES-Long Distance Relay, IP Relay, **Non-contract states**



	2013-14 FCC Annual Consumer Summary Log	
Nothing to report.		
	April 2014	
Nothing to report.		
	May 2014	
Nothing to report.		

ALL STATE CAPTEL 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

				0.400						7 7 6 6			
				CT07						4TO7			
Complaint Category	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Billing					1								1
Transparency													0
Confidentiality													0
Verbatim						1							1
Typing Issues	1				1	1			1	2	2		8
In Call Replacement						1							1
Answer Performance	1											1	2
Gender Accommodation													0
Total	2				1	3			2	2	7	1	13

AT&T CapTel Service	NUL	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE	2				2	3			1	2	2	1	13
ALL													
TOTAL													
TOTAL	2				2	3			1	2	2	1	13

ARIZONA TRADITIONAL/STS RELAY 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



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6/4/2014				2013						2014			
Complaint Category	NUC	TNF	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													0
Confidentiality													0
Verbatim				1									1
Typing Issues													0
In Call Replacement													0
Answer Performance													0
Gender Accommodation													0
Total	0	0	0	1	0	0	0	0	0	0	0	0	1

AT&T Arizona Relay JUN JUL AUG SEP OCT NOV DEC JAN FEB MAR APR APR MAR APR														
VOICE 1 0 <th>AT&T Arizona Relay</th> <th>NUL</th> <th>JUL</th> <th>AUG</th> <th>SEP</th> <th>OCT</th> <th>NOV</th> <th>DEC</th> <th>JAN</th> <th>FEB</th> <th>MAR</th> <th>APR</th> <th>MAY</th> <th>TOTAL</th>	AT&T Arizona Relay	NUL	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
TTY 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	VOICE													0
TOTAL 0 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	ТТУ				1									1
	TOTAL	0	0	0	1	0	0	0	0	0	0	0	0	1

ARIZONA - CAPTEL SERVICE 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

aint Category JUN JUL sincy											
plaint Category JUN JUL arency intiality		2013						2014			
Billing Transparency Confidentiality	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency Confidentiality											0
Confidentiality											0
											0
Verbatim											0
Typing Issues											0
In Call Replacement				1							1
Answer Performance										1	1
Gender Accommodation											0
Total											2

AT&T Arizona Relay	JUN	IUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE	0	0	0	0	0	1	0	0	0	0	0	l	2
ТТҮ	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	1	0	0	0	0	0	1	2

CALIFORNIA TRADITIONAL/STS RELAY 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													0
Confidentiality													0
Verbatim						1							1
Typing Issues													0
In Call Replacement													0
Answer Performance	1				2								က
Gender Accommodation									1		1		2
Total	1	0	0	0	2	1	0	0	1	0	1	0	9

AT&T California Relay JUN JUL AUG SEP OCT NOV DEC JAN FEB MAR APR MAY TO VOICE 1 2 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 <t< th=""><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th></t<>														
VOICE 1 2 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 <th>AT&T California Relay</th> <th>JUN</th> <th>JUL</th> <th>AUG</th> <th>SEP</th> <th>OCT</th> <th>NOV</th> <th>DEC</th> <th>NAL</th> <th>FEB</th> <th>MAR</th> <th>APR</th> <th>MAY</th> <th>TOTAL</th>	AT&T California Relay	JUN	JUL	AUG	SEP	OCT	NOV	DEC	NAL	FEB	MAR	APR	MAY	TOTAL
TTY	VOICE	1												1
TOTAL 1 0 0 0 2 1 0 0 1 0 1 0 0 0 0 0 0 0 0 0	ТТ					2	1			1		1		2
	TOTAL	1	0	0	0	2	1	0	0	1	0	1	0	9

COLORADO TRADITIONAL/STS RELAY 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency		1							1		1		3
Confidentiality													0
Verbatim													0
Typing Issues		1											1
In Call Replacement													0
Answer Performance			1										1
Gender Accommodation													0
Total	0	2	1	0	0	0	0	0	1	0	1	0	2

AT&T Colorado Relay JUN JUL AUG SEP OCT NOV DEC JAN FEB MAR APR MAY VOICE 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0														
0	AT&T Colorado Relay	NUC	JUL	AUG	SEP	OCT	NOV	DEC	NAL	FEB	MAR	APR	MAY	TOTAL
0	VOICE		1											1
0	ТТ		1	1						1		1		4
	TOTAL	0	2	1	0	0	0	0	0	1	0	1	0	2

COLORADO - CAPTEL SERVICE 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													
Confidentiality													
Verbatim													
Typing Issues										1			1
In Call Replacement													
Answer Performance													
Gender Accommodation													
Total	0	0	0	0	0	0	0	0	0	1	0	0	1

AT&T Colorado Relay	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE	0	0	0	0	0	0	0	0	0	1	0	0	1
ТТҮ	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0	0	1	0	0	1

WASHINGTON, DC TRADITIONAL/STS RELAY 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													0
Confidentiality													0
Verbatim													0
Typing Issues													0
In Call Replacement													0
Answer Performance													0
Gender Accommodation													0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0

AT&T Washington, DC Relay	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE													0
Д													0
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0

WASHINGTON DC - CAPTEL SERVICE 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													0
Confidentiality													0
Verbatim													0
Typing Issues													0
In Call Replacement													0
Answer Performance													0
Gender Accommodation													0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0
													ĺ

AT&T Washington, DC Relay	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE													0
ДЦ													0
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0

FLORIDA TRADITIONAL/STS RELAY 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency						1							1
Confidentiality													0
Verbatim													0
Typing Issues													0
In Call Replacement													0
Answer Performance	1				1								2
Gender Accommodation													0
Total	1	0	0	0	1	1	0	0	0	0	0	0	3

AT&T Florida Relay	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE													0
ТТУ	1				1	1							Э
TOTAL	1	0	0	0	1	1	0	0	0	0	0	0	3

FLORIDA - CAPTEL SERVICE 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													0
Confidentiality													0
Verbatim													0
Typing Issues	1								1	1	2		2
In Call Replacement													0
Answer Performance	1												1
Gender Accommodation													0
Total	2	0	0	0	0	0	0	0	1	1	2	0	9

AT&T Florida Relay	NUC	TNF	AUG	SEP	OCT	NOV	DEC	NAL	FEB	MAR	APR	MAY	TOTAL
VOICE	2	0	0	0	0	0	0	0	1	1	2	0	9
TTY													
TOTAL	2	0	0	0	0	0	0	0	1	1	2	0	9

MICHIGAN TRADITIONAL/STS RELAY 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUL	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency										1			1
Confidentiality													0
Verbatim													0
Typing Issues													0
In Call Replacement													0
Answer Performance													0
Gender Accommodation													0
Total	0	0	0	0	0	0	0	0	0	1	0	0	1

AT&T Michigan Relay	NUL	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE													0
ТТҮ										1			1
TOTAL	0	0	0	0	0	0	0	0	0	1	0	0	1

MICHIGAN - CAPTEL SERVICE 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUC	JUL	AUG	SEP	ОСТ	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Billing					1								1
Transparency													0
Confidentiality													0
Verbatim						1							1
Typing Issues					1	1							2
In Call Replacement													0
Answer Performance													0
Gender Accommodation													0
Total	0	0	0	0	2	2	0	0	0	0	0	0	4

AT&T Michigan Relay	NUL	JUL	AUG	SEP	OCT	NOV	DEC	NAL	FEB	MAR	APR	MAY	TOTAL
VOICE					2	2							4
ДЦ													0
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0

2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NOC	JUL	AUG	SEP	OCT	NOV	DEC	NAL	FEB	MAR	APR	MAY	TOTAL
Transparency					1								1
Confidentiality													0
Verbatim													0
Typing Issues													0
In Call Replacement													0
Answer Performance													0
Gender Accommodation													0
Total	0	0	0	0	1	0	0	0	0	0	0	0	1

AT&T Pennsylvania Relay	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE													0
ТТУ					1								1
TOTAL	0	0	0	0	1	0	0	0	0	0	0	0	1

TENNESSEE TRADITIONAL/STS RELAY 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

* FOC. *				2013						2017			
0/4/2014				2101	ſ						Ī		
Complaint Category	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency													0
Confidentiality													0
Verbatim													0
Typing Issues	1												1
In Call Replacement													0
Answer Performance													0
Gender Accommodation	1	1	1										3
Total	2	1	1	0	0	0	0	0	0	0	0	0	4

AT&T Tennessee Relay	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE													0
ТТУ	2	1	1										4
TOTAL	2	1	1	0	0	0	0	0	0	0	0	0	4

VIRGINIA TRADITIONAL/STS RELAY 2013 - 2014 ANNUAL SUMMARY OF CONSUMER COMPLAINTS June 1, 2013 through May 31, 2014



Complaint Summary by Category

6/4/2014				2013						2014			
Complaint Category	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
Transparency					1					1			2
Confidentiality													0
Verbatim													0
Typing Issues													0
In Call Replacement													0
Answer Performance													0
Gender Accommodation													0
Total	0	0	0	0	1	0	0	0	0	1	0	0	2

AT&T Virginia Relay	NUC	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	TOTAL
VOICE					1								1
TTY										1			1
TOTAL					1					1			2



2013-14 FCC Annual Consumer Summary Log

June 2013	2013, June 2
	The customer complained the captionists are spelling her name incorrectly.
	CATEGORY: Typing Issues
	RESOLUTION: Apologized and explained how captions are created, and suggested the customer to spell the name during the call so the captionist will use the correct spelling.
	CONTACT CLOSED: 2013, June 2
	***** **** **** **** **** **** ****
	2013, June 8 The customer complained there was silence a the beginning of 1-line
	captioned calls.
	CATEGORY: Answer Performance
	CATEGORI. Answer Ferformance
	RESOLUTION: Apologized and educated customer that it will be normal to experience a brief muted time while CapTel is establishing the connection.
	CONTACT CLOSED: 2013, June 8
July 2013	Nothing to report.
August 2013	Nothing to report.
September 2013	Nothing to report.
-	
October 2013	2013, October 7 The customer reported seeing repeating question marks, filling the screen.
	CATEGORY: Typing Issues
	RESOLUTION : Apologized and thanked customer for feedback. Call data was shared with supervisor who discussed with CA. They found a stuck key and the CA was advised on proper protocol for handling. CA shared feedback with customer.
	CONTACT CLOSED: 2013, October 15



2013-14 FCC Annual Consumer Summary Log

(continued)

2013, October 8

Customer reported extra long distance billing when using the CapTel phone in 1-Line mode.

CATEGORY: Billing

RESOLUTION: After receiving a copy of the bill, further investigation revealed that customer was registered with a different long distance PIC code for the same long distance company when using the phone in 1-Liine mode before later changing to 2-Line mode. After confirming customer's long distance carrier information with long distance carrier, CSR updated customer's long distance information accordingly. CSR also spent an extensive amount of time on behalf of the customer in contacting the long distance company to attempt to get a credit on the bill received, but was unsuccessful in bringing about that outcome as a third-party.

CONTACT CLOSED: 2013, November 5

November 2013

2013, November 5

Customer shared feedback regarding a random word in the captions in between the rings at the start of the call and provided specific call data.

CATEGORY: Verbatim

RESOLUTION: CSR apologized for incidence and thanked customer for the feedback. Call detail was shared with Call Center management for follow up with the CA by the CA's supervisor. CA supervisor increased coaching for the CA to ensure consistent quality performance.

CONTACT CLOSED: 2013, November 12

2013, November 19

Customer reported being disconnected when another captionist was taking over the call.

CATEGORY: In Call Replacement

RESOLUTION: CSR apologized to the customer for their experience and promised to investigate the call. CSR identified the call reported. Call detail was sent to the Call Center for further exploration. Call Center technical detail shows the call disconnected over one minute after the



2013-14 FCC Annual Consumer Summary Log

	(continued)
	CA swap and that one line disconnected shortly thereafter. Findings are inconclusive as to the cause of the disconnection. Detail shows one party disconnected over one minute after the CA swap and no trouble ticket was logged by the CA. The second CA was able to caption part of the call after the swap and that one line disconnected shortly thereafter. Findings are inconclusive as to the cause of the disconnection. Detail shows one party disconnected prior to the CA disconnection after party was no longer on the line.
	CONTACT CLOSED: 2013, December 9, 2013
	***** **** **** **** **** **** **** ****
	2013, November 29 Customer's daughter reported misspellings in the captions on the CapTel 840.
	CATEGORY: Typing Issues
	RESOLUTION : CSR contacted customer to try to get further details. Customer shared specific examples of inaccurate captions but was unable to provide the date, time, or CA #. CSR apologized for the incidence and thanked customer for the feedback. Feedback as received was passed on to Call Center Management. CSR suggested customer document the date, time, and CA# of any future calls to allow us to take specific action with the CA captioning the call.
	CONTACT CLOSED: 2013, December 4
December 2013	Nothing to report.
January 2014	Nothing to report.
February 2014	2014, February 10 The customer reported the CA was not captioning the correct words, and there were accuracy issues.
	CATEGORY: Typing Issues
	RESOLUTION: Apologized and arranged for a call back from a supervisor. Supervisor also coached CA and performed additional monitoring.
	CONTACT CLOSED: 2014, February 20



2013-14 FCC Annual Consumer Summary Log

2013-14 FCC Annual Consumer Summary Log		
March 2014	2014, March 6 The customer reported a lag in captions behind spoken words on some calls.	
	CATEGORY: Typing Issues	
	RESOLUTION : Apologized and CA investigated calls with a lag time. Captionist's supervisors increased monitoring frequency.	
	CONTACT CLOSED: 2014, April 1	
	***** **** **** **** **** **** **** ****	
	2014, March 17 The customer reported inaccurate captions during calls.	
	CATEGORY: Typing Issues	
	RESOLUTION: Apologized and thanked customer for bringing matter to our attention. Customer did not have specifics about CSR; we suggested she document date, time and CA # if the problem occurs again.	
	CONTACT CLOSED: 2014, March 17	
April 2014	2014, April 26 The customer reported sometimes names and medicines names are misspelled.	
	CATEGORY: Typing Issues	
	RESOLUTION : Apologized and thanked customer for brining matter to our attention. Customer did not have any specifics about CSR; we suggested she document the date, time and CA# if the problem occurs again.	
	CONTACT CLOSED: 2014, April 26	
	***** **** **** **** **** **** **** ****	
	2014, April 27 The customer reported that captions of a phone number came up incorrect.	

CATEGORY: Typing Issues



2013-14 FCC Annual Consumer Summary Log

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	(continued)
	RESOLUTION : Apologized and thanked customer for bringing matter to our attention. Customer did not have any specifics about CSR; we suggested she document the date, time and CA# if the problem occurs again.
	CONTACT CLOSED: 2014, April 27
May 2014	2014, May 21 Caller to CapTel user reported seeing, "Please stay on the line your captions will be available shortly" on the CapTel 840.
	CATEGORY: Answer Performance
	RESOLUTION : CSR apologized and advised that this message indicates the call may have been placed at a peak time and would be answered by the next available CA. CSR recommended caller stay on the line and call would be connected shortly. CSR noted on rare occasion calls may experience additional seconds of connection time and advised customer to try the call again. Caller's follow up call to the CapTel user was successful. Call Center answer time for the day met the FCC requirements.
	CONTACT CLOSED: 2014, May 21

ARIZONA RELAY SERVICE 2013-14 FCC Annual Consumer Summary Log



June 2013
Nothing to report.
July 2013
Nothing to report.
August 2013 Nothing to report.
Nothing to report.
September 2013
TTY 2013, September 13 The customer complained the CA did not type verbatim. Category: Other (CA/OPR) Escalation: Received by the Pennsylvania Relay Center and handled by the same. Resolution: Apologized for the inconvenience, and assured the customer the CA's manager would follow up accordingly. Contact Closed: 2013, September 14 FCC: Verbatim
October 2013
Nothing to report.
November 2013 Nothing to report.
December 2013 Nothing to report.
January 2014 Nothing to report.
February 2014
Nothing to report.



ARIZONA RELAY SERVICE 2013-14 FCC Annual Consumer Summary Log

March 2014

Nothing to report.

April 2014

Nothing to report.

May 2014

Nothing to report.

California Relay Service 2013-14 FCC Annual Consumer Summary Log



June 2013

Voice 2013, June 11

The customer complained he/she had to wait a long time to reach a CA.

Category: Answer/Wait Time

Escalation: Received by the National Customer Care Center and handled by the same.

Resolution: Apologized for the customer's inconvenience.

Contact Closed: 2013, June 11 **FCC:** Answer Performance

July 2013

Nothing to report.

August, 2013

Nothing to report.

September 2013

Nothing to report.

October 2013

TTY 2013, October 17

The customer complained that he/she experienced delays in reaching a Communication Assistant.

Category: Answer/Wait Time

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized and advised we would forward this issue to the technical team.

Contact Closed: 2013, October 17

FCC: Answer Performance

TTY 2013, October 23

The customer complained that he/she expericenced delays in reaching a Communication Assistant.

Category: Answer/Wait Time

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized and advised we would forward this issue to the technical team.

Contact Closed: 2013, October 23

FCC: Answer Performance

Calif 2013-14 Cons Log.docx

California Relay Service 2013-14 FCC Annual Consumer Summary Log



November 2013

TTY 2013, November 5

The customer complained the CA had not relayed the call verbatim.

Category: Other (CA/OPR)

Escalation: Received by the Pennsylvania Relay Center and handled by the same.

Resolution: Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly.

Contact Closed: 2013, November 5

FCC: Verbatim

December 2013

Nothing to report.

January 2014

Nothing to report.

February 2014

TTY 2014, February 28

The customer complained that the CA did not comply with his/her gender request.

Category: Other (CA/OPR)

Escalation: Received by the National Customer Care Center and handled by the same.

Resolution: Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly.

Contact Closed: 2014, February 28 **FCC:** Gender Accommodation

March 2014

Nothing to report.

April 2014

TTY 2014, April 26

The customer complained that the CA did not comply with his/her gender request.

Category: Other (CA/OPR)

Escalation: Received by the National Customer Care Center and handled by the same.

Calif 2013-14 Cons Log.docx 2

California Relay Service 2013-14 FCC Annual Consumer Summary Log



Resolution: Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly. **Contact Closed:** 2014, April 26 **FCC:** Gender Accommodation

May 2014

Nothing to report.

Calif 2013-14 Cons Log.docx 3

COLORADO RELAY SERVICE



2013-14 FCC Annual Consumer Summary Log

June 2013

Nothing to report.

July 2013

Voice 2013, July 10

The caller complained that the CA was not transparent during call.

Category: Attitude and Manner

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized for any inconvenience. Caller did not have CA number. Call trace

inclusive.

Contact Closed: 2013, July 10

FCC: Transparency

TTY 2013, July 10

The customer complained that the CA had too many typing errors; did not provide his/her ID and did not keep him/her informed of call progress.

Category: Typing Skill/Speed

Escalation: Received by the Pennsylvania Relay Center and handled by the same.

Resolution: Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly. **Contact Closed:** 2013, July 10

FCC: Typing Issue

August 2013

TTY 2013, August 26

The customer complained that he/she experienced delays in reaching a CA.

Category: Answer/Wait Time

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized and advised we would forward this issue to the technical team.

Contact Closed: 2013, August 26

FCC: Answer Performance

September 2013

Nothing to report.

October 2013

COLORADO RELAY SERVICE



2013-14 FCC Annual Consumer Summary Log

Nothing to report.

November 2013

Nothing to report.

December 2013

Nothing to report.

January 2014

Nothing to report.

February 2014

TTY 2014, February 25

The customer complained that the CA did not keep him/her informed of the progress of his/her call.

Category: Other (CA/OPR)

Escalation: Received by the Pennsylvania Relay Center and handled by the same.

Resolution: Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly.

Contact Closed: 2014, February 25

FCC: Transparency

March 2014

Nothing to report.

April 2014

TTY 2014, April 3

The customer complained the CA did not follow instructions.

Category: Other (CA/OPR)

Escalation: Received by the Pennsylvania Relay Center and handled by the same.

Resolution: Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly. **Contact Closed:** 2014, April 3

FCC: Transparency

May 2014

Nothing to report.





June 2013
Nothing to report.
July 2013
Nothing to report.
August 2013
Nothing to report.
September 2013
Nothing to report.
October 2013
Nothing to report.
November 2013
Nothing to report.
December 2013
Nothing to report.
January 2014
Nothing to report.
February 2014
Nothing to report.
March 2014
Nothing to report.

DC 2013-14 Annual Cons Log 1





April 2014

Nothing to report.

May 2014

Nothing to report.

DC 2013-14 Annual Cons Log 2

FLORIDA RELAY SERVICE



2012-13 FCC Annual Consumer Summary Log

June 2013

TTY 2013, June 1

The customer complained he/she had to wait a long time to reach a CA.

Category: Answer/Wait Time

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized and advised we would forward this issue to the technical team.

Contact Closed: 2013, June 1 **FCC:** Answer Performance

July 2013

Nothing to report.

August 2013

Nothing to report.

September 2013

Nothing to report

October 2013

TTY 2013, October 10

The customer complained he/she had to wait a long time to reach a CA.

Category: Answer/Wait Time

Escalation: Received by the Florida Relay Center and handled by the same.

Resolution: Apologized for the customer's inconvenience.

Contact Closed: 2013, October 10

FCC: Answer Performance

November 2013

TTY 2013, November 26

The customer complained the CA was not transparent.

Category: Other (CA/OPR)

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly.

Contact Closed: 2013, November 26

FCC: Transparency





Nothing to report.

January 2014

Nothing to report

February 2014

Nothing to report.

March 2014

Nothing to report.

April 2014

Nothing to report.

May 2014

Nothing to report.



MICHIGAN RELAY SERVICES 2013-14 FCC Annual Consumer Summary Log

	June 2013
Nothing to report.	
	July 2013
Nothing to report.	
	August 2013
Nothing to report.	
	September 2013
Nothing to report.	
	October 2013
Nothing to report.	
	November 2013
Nothing to report.	
	December 2013
Nothing to report.	
	January, 2014
Nothing to report.	
	February 2014
Nothing to report.	

at&t

MICHIGAN RELAY SERVICES 2013-14 FCC Annual Consumer Summary Log

March 2014

TTY 2014, March 25

The customer complained the CA was rude and interjected impolite comments on the call.

Category: Attitude and Manner

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly. **Contact Closed:** 2014, March 25

FCC: Transparency

April 2014

Nothing to report.

May 2014

Nothing to report.





June 2013
Nothing to report.
July 2013 Nothing to report.
August 2013
Nothing to report.
September 2013
Nothing to report.
October 2013
TTY 2013, October 18 The customer complained the CA was rude and interjected impolite comments on the call. Category: Attitude and Manner Escalation: Received by the Pennsylvania Relay Center and handled by the same. Resolution: Apologized for the inconvenience, and assured the customer the CA's manager would follow up accordingly. Contact Closed: 2013, October 18 FCC: Transparency
November 2013
Nothing to report.
December 2013 Nothing to report.
January 2014 Nothing to report.
February 2014
Nothing to report.

PA 2013-14 Annual Cons Log 1



PENNSYLVANIA RELAY SERVICE 2013-14 FCC Annual Consumer Summary Log

March 2014

Nothing to report.

April 2014

Nothing to report.

May 2014

Nothing to report.

PA 2013-14 Annual Cons Log 2

TENNESSEE RELAY SERVICE



2013-14 FCC Annual Consumer Summary Log

June 2013

TTY 2013, June 10

The customer complained CA's need to improve typing skills.

Category: Typing Skill/Speed

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized for the customer's inconvenience. Referred information to

management for follow up/review. **Contact Closed:** 2013, June 10

FCC: Typing Issue

TTY 2013, June 12

The customer complained the CA did not comply with his/her gender request.

Category: Other (CA/OPR)

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly. **Contact Closed:** 2013, June 12 **FCC:** Gender Accommodation

July 2013

TTY 2013, July 22

The customer complained that the CA did not comply with his/her gender accommodation request.

Category: Other (CA/OPR)

Escalation: Received by the Pennsylvania Relay Center and handled by the same.

Resolution: Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly. **Contact Closed:** 2013, July 22 **FCC:** Gender Accommodation

August 2013

TTY 2013, August 12

The customer complained that the CA did not comply with his/her gender accommodation request.

Category: Other (CA/OPR)

Escalation: Received by the National Customer Care Center and handled by the same. **Resolution:** Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly.

TENNESSEE RELAY SERVICE 2013-14 FCC Annual Consumer Summary Log



Contact Closed: 2013, August 12 **FCC:** Gender Accommodation

	September 2013
Nothing to report.	
	October 2013
Nothing to report.	
	November 2013
	November 2013
Nothing to report.	
	December 2013
	December 2015
Nothing to report.	
	1
	January 2014
Nothing to report.	
	February 2014
Nothing to report.	
	March 2014
Nothing to report.	
6 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	April 2014
Nothing to report.	
Nothing to report.	
	May 2014
Nothing to young	
Nothing to report.	

VIRGINIA RELAY SERVICE



2013-14 FCC Annual Consumer Summary Log

June 2013			
Nothing to report.			
July 2013			
Nothing to report.			
August 2013			
Nothing to report.			
September 2013			
Nothing to report.			
October 2013			
Voice 2013, October 3 The customer complained the CA did not follow instructions and assumed control of the call. Category: Other (CA/OPR) Escalation: Received by the Virginia Relay Center and handled by the same. Resolution: Apologized for the inconvenience, and assured the customer the CA's manager would follow up accordingly. Contact Closed: 2013, October 3 FCC: Transparency			
November 2013			
Nothing to report.			
December 2013			
Nothing to report.			
January 2014			
Nothing to report.			

VIRGINIA RELAY SERVICE



2013-14 FCC Annual Consumer Summary Log

February 2014

Nothing to report.

March 2014

TTY 2014, March 18

The customer complained the CA refused to place his/her relay call.

Category: Other (CA/OPR)

Escalation: Received by the Virginia Relay Center and handled by the same.

Resolution: Apologized for the inconvenience, and assured the customer the CA's manager

would follow up accordingly. **Contact Closed:** 2014, March 18

FCC: Transparency

April 2014

Nothing to report.

May 2014

Nothing to report.